

# **EXHIBIT "C"**

Page 9

Page 11

(1) know what it is?  
(2) **A.** It is Vincent Rizzo Construction, yes.  
(3) **Q.** What is it?  
(4) **A.** It is actually, it's a Construction  
(5) Company, that doesn't, it doesn't really  
(6) operate as construction. It's just a property  
(7) holder where our office is at.  
(8) **Q.** What is the relationship, if any, or what  
(9) was the relationship, if any, between Ashland  
(10) Construction Company, Incorporated and Vincent  
(11) Rizzo Construction Company, Incorporated?  
(12) **MR. SMALL:** As of what time?  
(13) **BY MR. CASEY:**  
(14) **Q.** As of at any time since August 30, 2002  
(15) and including that date, sir?  
(16) **MR. SMALL:** Do you know when Vincent  
(17) Rizzo Construction Company started to  
(18) exist?  
(19) **THE WITNESS:** Actually Vincent Rizzo  
(20) existed for a period of time, that was  
(21) actually my father's company. It was  
(22) actually a union shop way back when.  
(23) But the actual company now, the company  
(24) never operated in the construction

(1) **Q.** I understand I think. Did Ashland  
(2) Construction Company, Incorporated have any of  
(3) its employees on the premises of the 3220  
(4) Coachman Road address on August 30, 2002?  
(5) **A.** Yes, it was myself and a laborer, a  
(6) helper, which was Salvador Ortiz.  
(7) **Q.** Were there any other persons affiliated  
(8) with Ashland Construction Company, Incorporated  
(9) on the premises of 3220 Coachman Road on August  
(10) 30, 2002 besides yourself and Mr. Ortiz?  
(11) **A.** No, sir.  
(12) **Q.** Where does Salvador Ortiz live?  
(13) **A.** Mexico. As far as an address in Mexico,  
(14) I have no clue what it is.  
(15) **Q.** When did he return to Mexico?  
(16) **A.** I would say over a year and a half ago.  
(17) **Q.** Was he in this country legally as of  
(18) August 30, 2002?  
(19) **MR. SMALL:** Objection, this is for  
(20) jurisdiction for Ashland Construction,  
(21) Vincent Rizzo Construction, Joseph  
(22) Rizzo. He is not party. This is beyond  
(23) Judge Brody's order. I'm going to  
(24) instruct him not to answer.

Page 10

Page 12

(1) field. It just held the property where  
(2) our office was.  
(3) **BY MR. CASEY:**  
(4) **Q.** As of August 30, 2002, on that date, did  
(5) Vincent Rizzo Construction Company,  
(6) Incorporated exist?  
(7) **A.** As of that date, the actual, the company  
(8) was to hold, held the property. Yes, there was  
(9) a Vincent Rizzo Construction Company.  
(10) **Q.** On that date, August 30, 2002?  
(11) **A.** Correct.  
(12) **Q.** Were any persons affiliated with Vincent  
(13) Rizzo Construction Company, Incorporated on the  
(14) premises at 3220 Coachman Road in Wilmington on  
(15) August 30, 2002?  
(16) **A.** No, sir.  
(17) **Q.** What was your affiliation with Vincent  
(18) Rizzo Construction Company, Incorporated as of  
(19) August 30, 2002?  
(20) **A.** It was just a property holder, the  
(21) company never operated as construction, it just  
(22) held property.  
(23) **Q.** Did the company have any employees?  
(24) **A.** No, sir.

(1) **MR. CASEY:** Mike, the reason I'm  
(2) asking, at this juncture, is it does  
(3) relate to venue and jurisdiction. At  
(4) least it's reasonably calculated to.  
(5) What I'm interested in knowing is where  
(6) he came across Mr. Ortiz and if he is in  
(7) this country, was in this country  
(8) legally, I could obtain additional  
(9) documentation to that effect.  
(10) I want to learn whether, for  
(11) example, Mr. Rizzo recruited Mr. Ortiz  
(12) from Pennsylvania or Philadelphia,  
(13) that's why I'm asking the question.  
(14) **MR. SMALL:** You can ask that  
(15) question, that's a totally different  
(16) question than what you asked.  
(17) **MR. CASEY:** If he is in the country  
(18) legally then there would be  
(19) documentation to that effect and I can  
(20) find out where the man hales from. That  
(21) is the reason I'm asking.  
(22) **BY MR. CASEY:**  
(23) **Q.** What is your understanding, sir, of Mr.  
(24) Ortiz' citizenship status as of the time that